

BURSOR & FISHER, P.A.  
L. Timothy Fisher (State Bar No. 191626)  
Sarah N. Westcot (State Bar No. 264916)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: ltfisher@bursor.com  
swestcot@bursor.com

BURSOR & FISHER, P.A.  
Scott A. Bursor (State Bar No. 276006)  
369 Lexington Avenue, 10<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 989-9113  
Facsimile: (212) 989-9163  
E-Mail: scott@bursor.com

BRAMSON, PLUTZIK, MAHLER & BIRKHAUSER, LLP  
Alan R. Plutzik (State Bar No. 077785)  
2125 Oak Grove Road, Suite 120  
Walnut Creek, CA 94598  
Telephone: (925) 945-0200  
Facsimile: (925) 945-8792  
E-Mails: aplutzik@bramsonplutzik.com

*Attorneys for Defendants Power  
Ventures, Inc. and Steve Vachani*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FACEBOOK, INC.,

Plaintiff,

-against-

POWER VENTURES, INC. d/b/a POWER.COM, a  
California corporation; POWER VENTURES, INC.  
a Cayman Island Corporation, STEVE VACHANI,  
an individual; DOE 1, d/b/a POWER.COM, an  
individual and/or business entity of unknown nature;  
DOES 2 through 25, inclusive, individuals and/or  
business entities of unknown nature,

Defendants.

Case No. 5:08-cv-05780 JW

**DEFENDANTS' ADMINISTRATIVE  
MOTION FOR SEALING ORDER  
PURSUANT TO CIVIL L.R. 79-5(D)  
IN CONNECTION WITH  
DEFENDANTS' REPLY BRIEF IN  
SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to Local Rules 7-11 and 79-5, Defendants Power Ventures, Inc. and Steve Vachani submit this Administrative Motion for sealing order regarding portions of Defendants' Reply Brief in Support of Motion for Summary Judgment.

Portions of Defendants' Reply Brief in Support of Motion for Summary Judgment make reference to the Declaration of Ryan McGeehan. The Declaration of Ryan McGeehan has been designated by Plaintiff as confidential pursuant to the parties' February 4, 2011 Protective Order (Dkt. No. 95).

Defendants hereby lodge with the Clerk, pursuant to Local Rule 79-5(d), the aforementioned brief, pending this Court's decision following the filing of Plaintiff's Declaration (demonstrating good cause to seal the McGeehan declaration from the public record) and narrowly tailored proposed sealing order. Civil L.R. 79-5(d).

Respectfully submitted,

Dated: December 12, 2011

BURSOR & FISHER, P.A.

By: /s/ L. Timothy Fisher  
L. Timothy Fisher

L. Timothy Fisher (State Bar No. 191626)  
Sarah N. Westcot (State Bar No. 264916)  
1990 North California Blvd., Suite 940  
Walnut Creek, CA 94596  
Telephone: (925) 300-4455  
Facsimile: (925) 407-2700  
E-Mail: ltfisher@bursor.com  
swestcot@bursor.com

BURSOR & FISHER, P.A.  
Scott A. Bursor (State Bar No. 276006)  
369 Lexington Avenue, 10<sup>th</sup> Floor  
New York, NY 10017-6531  
Telephone: (212) 989-9113  
Facsimile: (212) 989-9163  
E-Mail: scott@bursor.com

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BRAMSON PLUTZIK MAHLER &  
BIRKHAEUSER, LLP  
Alan R. Plutzik (State Bar No. 77785)  
2125 Oak Grove Road, Suite 120  
Walnut Creek, CA 94598  
Telephone: (925) 945-0200  
Facsimile: (925) 945-8792  
E-Mail: [aplutzik@bramsonplutzik.com](mailto:aplutzik@bramsonplutzik.com)

*Attorneys for Defendants Power  
Ventures, Inc. and Steve Vachani*